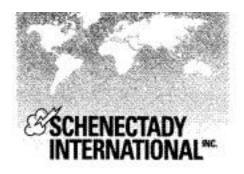
## Corporate Address

P.O. Box 1046 Schenectady, New York 12301 Phone: 518-370-4200 Fax: 518-346-3111



1302 Congress Street & Tenth Avenue Schenectady, New York 12303 Fax: 518-348-3111

2750 Balltown Road Schenectady, New York 12309 Fax: 518-382-8129

797 Broadway Schenectady, New York 12305 Fax: 518-382-5417

1000 Main Street, Route SS Rotterdam Junction, New York 12150 Fac: 518-687-2396

AR 201-13007

April 13, 2001

Ms. Christie Whitman, Administrator US Environmental Protection Agency P.O. Box 1473 Merrifield, VA 22116 Attn: Chemical Right-to-Know Program

RE: Robust Summary and Test Plan for Registration Number

Dear Ms. Whitman:

In accordance with the commitment to the HPV Challenge Program (AR-201) made by Schenectady International, Inc. (SII) in our letters to the EPA of November 18, 1999, December 13, 1999 and January 15, 2001, we are submitting herewith the Robust Summaries and Test Plans for 17 alkylphenols. The identity of these materials can be found in the Table of Contents of the Robust Summary (page 2).

It is our understanding that another company has also volunteered for p-(alpha, alpha-Dimethylbenzyl)phenol, CAS number 599-64-4. That company is performing some additional tests on this compound (results not yet available), which may verify some of the calculated values shown in our report.

The Robust Summaries and Test Plan are provided in three spiral bound volumes. In addition to the hard copy report, we have provided the entire document as an Adobe Acrobat (pdf) file on the enclosed disk.

If you have questions or comments regarding this submission, please contact me at the address shown above, by telephone at 518-347-4512, by FAX at 518-382-5417 or sia email at <a href="mailto:dawn.hvnes@stigroup.com">dawn.hvnes@stigroup.com</a>.

Very truly yours,

Dawn E. Hynes Toxicology and Regulatory Affairs Specialist DPPT CBIC

ENCLOSURE